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ATTORNEYS FOR DEFENDANT
ZAREPTA CHEMICAL KS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
STOLTHAVEN HOUSTON, INC.,

Plaintiff,

v.

RACHEL B, its engines, tackle, apparel, etc., *in rem*,
and HILTVEIT ASSOCIATES, INC. and
ZAREPTA CHEMICAL KS, *in personam*,

Defendants.
-----X

08 Civ. 4327 (RPP)

DECLARATION OF
MR. MORTEN WERRING

Mr. Morten E. Werring, being duly sworn in accordance with 28 U.S.C. § 1746, declares and states:

1. I am the Chairman of Defendant Zarepta Chemical KS ("Zarepta"), a defendant in this matter. I am familiar with the facts stated herein through my position with Zarepta, my review of Zarepta's files, and my communications with colleagues at Zarepta. I submit this Reply Declaration in further support of Zarepta's Motion to Vacate a Maritime Attachment.

2. Zarepta has no officers, directors or employees that are affiliated with Hiltveit which is an entity doing business in New York. Zarepta is a Norwegian company with its offices in Oslo, Norway.

3. We, Zarepta Chemical KS, have never been involved in the operation of the vessel since the M/T "Rachel B" (hereinafter referred to as "vessel") is on a Bareboat Charter to Norfolk LP. Hiltveit Associates Inc pursuant to a BBCP dated 25.05.2004. We have never been contacted by US Coast Guard, class society and/or any other governmental parties that the vessel had been detained at Falmouth. The latter situation was handled solely by Messrs. Hiltveit Associates Inc. in his position as Manager for the vessel. We were informed that Zarepta Chemical KS was mentioned in a press report by one of our Board Members who had found an article on the internet by coincidence.

4. Neither Norfolk, L.P. nor its apparent general partner Hiltveit act as agents for Zarepta. Nor have they ever done so.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


MORTEN E. WERRING

Executed this 16 day of June, 2008 in Oslo, Norway.

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